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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANTHONY PETRU and MARCUS MATHIS,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

APPLE INC.; HACHETTE BOOK GROUP,
INC.; HARPERCOLLINS PUBLISHERS, INC.;
MACMILLAN PUBLISHERS, INC; PENGUIN
GROUP (USA) INC.; and SIMON &
SCHUSTER, INC.,

Defendants.

No. C11-03892 EMC

DECLARATION OF JEFF D.
FRIEDMAN IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES
SHOULD BE RELATED

ACTION FILED: August 9, 2011

[caption continued on next page]

REBECCA L. ROSSMAN, MIRIAM
CUMMINGS, CAROLE C. KEHL, and
KAMAL SONTI, Individually and on Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

APPLE INC.; HACHETTE BOOK GROUP,
INC.; HARPERCOLLINS PUBLISHERS, INC.;
MACMILLAN PUBLISHERS, INC.;
PENGUIN GROUP (USA) INC.; and SIMON &
SCHUSTER, INC.,

Defendants.

No. C 11-04192 MEJ

ACTION FILED: August 24, 2011

1 I, JEFF D. FRIEDMAN, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the State of
3 California. I am a partner with the law firm of Hagens Berman Sobol Shapiro LLP, one of the
4 counsel of record for Plaintiff Rebecca L. Rossman. I am making this declaration in support of the
5 administrative motion to relate cases filed in behalf of Rebecca L. Rossman and the eBook
6 Plaintiffs in *Rossman et al. v. Apple Inc., et al.*, No. C 11-04192 MEJ, filed Aug. 24, 2011
7 (“*Rossman*”). I have personal knowledge of the matters stated herein and, if called upon, I could
8 and would competently testify thereto.

9 2. Attached hereto as Exhibit A is a true and correct copy of the Complaint filed in
10 *Rossman*. *Rossman* is currently assigned to the Honorable Magistrate Judge Maria-Elena James.
11 *Rossman* is a class action brought on behalf of purchasers of eBooks. It arises from an alleged
12 conspiracy to fix prices by the defendants.

13 3. A stipulation pursuant to Civil Local Rule 7-11(a) could not be obtained because
14 defendants in the *Rossman* action have not yet appeared.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is
16 true and correct. Executed this 31st day of October, 2011, at Berkeley, California.

17
18 /s/ Jeff D. Friedman
JEFF D. FRIEDMAN

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses registered, as denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/ Jeff D. Friedman
JEFF D. FRIEDMAN

Mailing Information for a Case 3:11-cv-03892-EMC

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)

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